

# EXHIBIT H

# Mobile Data Technologies

v.

Samsung\*

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Asserted U.S. Patent No. 9,922,348

“Method, apparatus and system for management of information content for enhanced accessibility over wireless communication networks”

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Plaintiff’s Claim Charts

Exhibit H

\*Infringement by both Samsung defendants is evidenced in similarly, so that there is only one chart per patent as to the Complaint.

This claim chart is based on publicly available information regarding Defendants' products. Plaintiff will be seeking Defendants' internal documentation, including without limitation technical documentation such as schematics and datasheets as well as source, in discovery and therefore Plaintiff reserves the right to amend or further supplement this claim chart in accordance with the Court's schedule and local patent rules.

The term "Accused Products" herein means the same as in the Complaint, which is hereby incorporated by reference.

This claim chart specifically addresses infringement of Claim 1 ("Asserted Claim") of the '348 Patent by Defendants' Accused Products, and merely demonstrates one way in which Defendants infringe this claim of the '348 Patent.

These charts provide representative examples of direct infringement. To the extent that the charts reference Accused Products utilized by third-parties, Plaintiff's infringement assertion is still one of direct infringement because either a single Defendant is responsible for all accused functionality, or a plurality of Defendants constitute a joint enterprise that direct or control other Defendant(s)'s performance of the accused functionality. *See, e.g., Akamai Technologies, Inc. v. Limelight Networks, Inc.*, 797 F.3d 1020 (2015).

These charts show literal infringement. However, Plaintiff has additionally asserted infringement under the doctrine of equivalents. To the extent that the Accused Products are found to not literally infringe the express terms of the claims in suit, the elements of the Accused Products and the claimed elements of the patented invention are equivalent and Defendant infringements under the doctrine of equivalents. Plaintiff does not waive its assertions under the doctrine of equivalents.

Although Plaintiff will provide its damages information at the date set by the Court,, Plaintiff makes clear that it is also seeking damages based on convoyed sales.

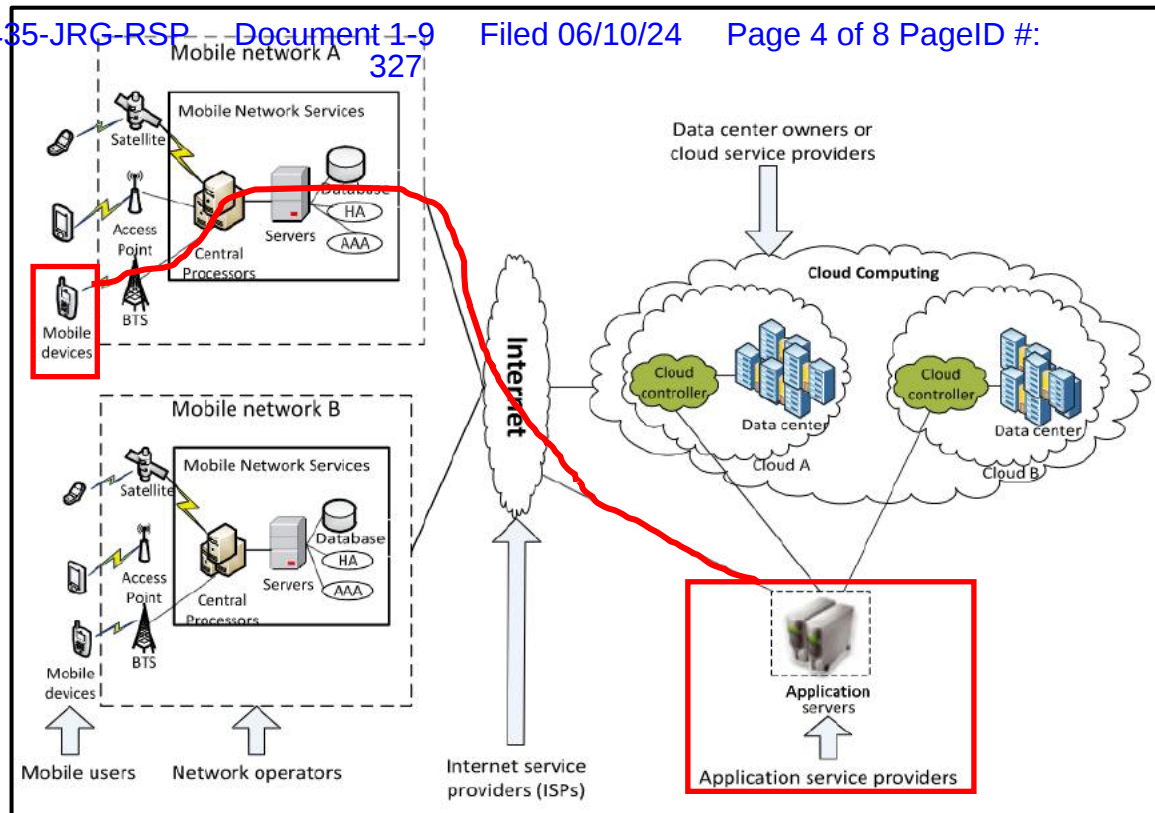
Claim: 1 – Element (A)

An apparatus comprising:

a processing element comprising a processor coupled to a memory; and

a network interface coupled to the processing element and configured to communicate with a plurality of mobile devices over at least one network;

- The “**Samsung Members**” app operates from servers located at us.community.samsung.com.
- The servers at this location necessarily have a processing element that is coupled to a memory.
- The servers also necessarily have a network interface that can communicate with a plurality of mobile devices over the network.



Source:

<https://onlinelibrary.wiley.com/doi/epdf/10.1002/wcm.1203>

**Welcome to the Samsung Members Community**

Explore your new hub for all things Samsung and beyond. Connect with Samsung experts, super-fans, and other Community members for tips on features and how to get the most out of your Samsung product.

Search all content

MEMBERS	TOPICS	SOLUTIONS	ONLINE
18,883,993	21,172	16,035	98,364

[https://us.community.samsung.com/t5/Samsung-Community/ct-p/us?page=1&tab=recent\\_topics](https://us.community.samsung.com/t5/Samsung-Community/ct-p/us?page=1&tab=recent_topics)

Welcome to the Samsung Members Community

Date acquired: 2/12/2024

- The app “**Samsung Members**” community has almost 19 million members.
- Claim 1, Element (A) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

## Claim: 1 – Element (B)

the processing element  
being configured:

to receive first device-  
captured data from a  
first one of the mobile  
devices via the  
network interface;

- The processing element at the “**Samsung Members**” server is configured to receive first device-captured data from a first mobile device.
- The image at right shows device-captured image data from a first user “Tom383.”



<https://us.community.samsung.com/t5/Creator/Burj-Khalifa/m-p/2751579#M4937>

Original topic: Burj Khalifa

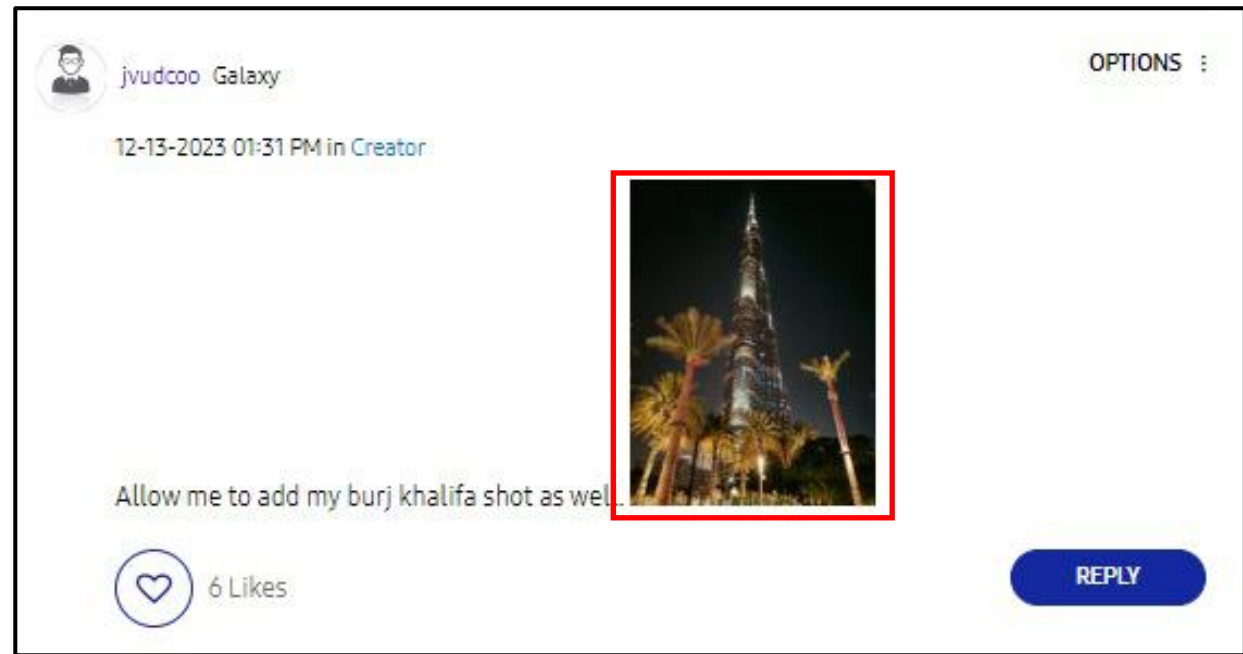
Date acquired: 2/12/2024

Claim 1, Element (B) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

## Claim: 1 – Element (C)

to receive second device-captured data from a second one of the mobile devices via the network interface; and

- The processing element at the “**Samsung Members**” server is configured to receive second device-captured data from a second mobile device.
- The image at right shows device-captured image data from a second user user “jvudcoo.”



<https://us.community.samsung.com/t5/Creator/Burj-Khalifa/m-p/2751579#M4937>

Original topic: Burj Khalifa

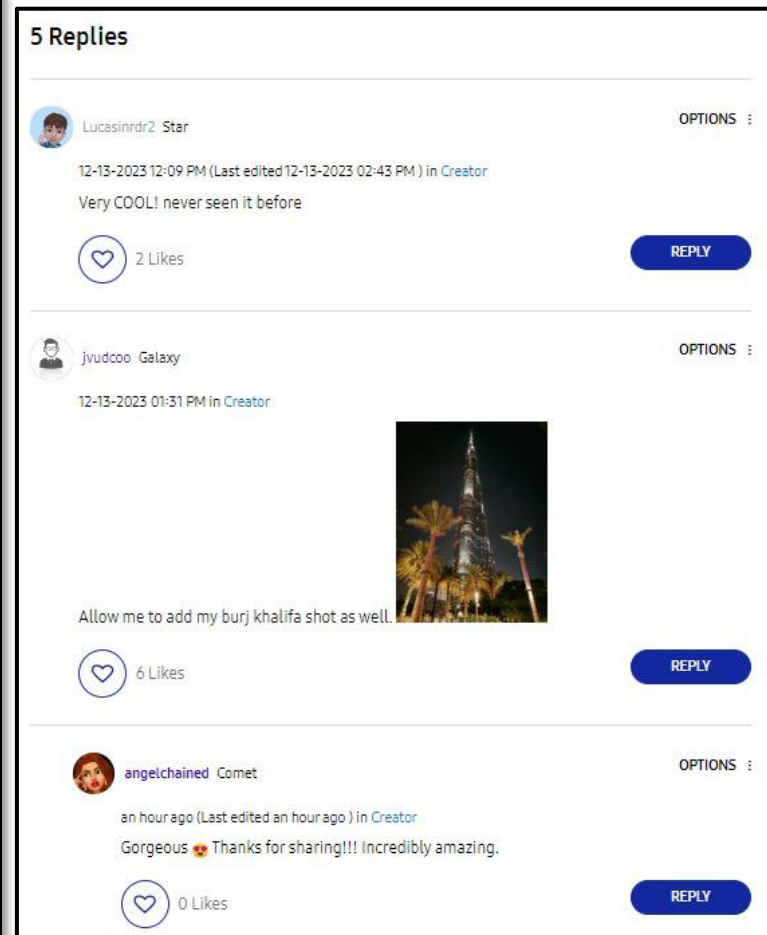
Date acquired: 2/12/2024

Claim 1, Element (C) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

Claim: 1 – Element (D)

to integrate the first and second device-captured data into a web-based shared information channel controllably accessible to first and second users of the respective first and second mobile devices

- The processing element at the “**Samsung Members**” server is configured to integrate the first and second images into a single web-based shared information channel (Burj Khalifa thread at the URL shown at right).
- The thread is controllably accessible to the first and second mobile devices (mobile device of users tom383 and jvudcoo).



<https://us.community.samsung.com/t5/Creator/Burj-Khalifa/m-p/2751579#M4937>

Original topic: Burj Khalifa

Date acquired: 2/12/2024

Claim 1, Element (C2) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

Claim: 1 – Element (E)



<https://www.youtube.com/watch?v=K0ySaHwhJzs>

Samsung Members: Service Features

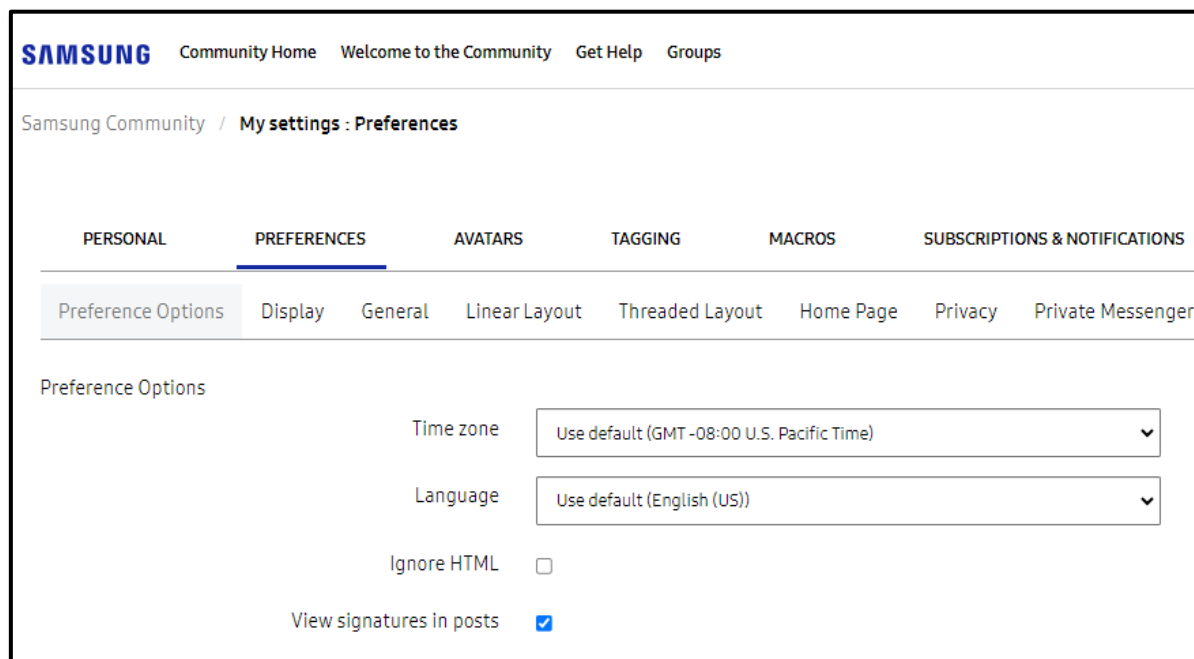
Date acquired: 2/13/2024

via respective personalized content applications of the first and second mobile devices.

- “**Samsung Members**” is a personalized content application.

- Each “**Samsung Members**” user must be registered on the server.

- Each user’s account is personalized by the user. The account can be personalized in a variety of ways, including the way the pages are displayed to the user, as well as selection of avatars, signatures, and many other settings.



<https://us.community.samsung.com/t5/user/myprofilepage/tab/user-preferences>

My Settings: Preferences

Date acquired: 2/12/2024

Claim 1, Element (D) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.